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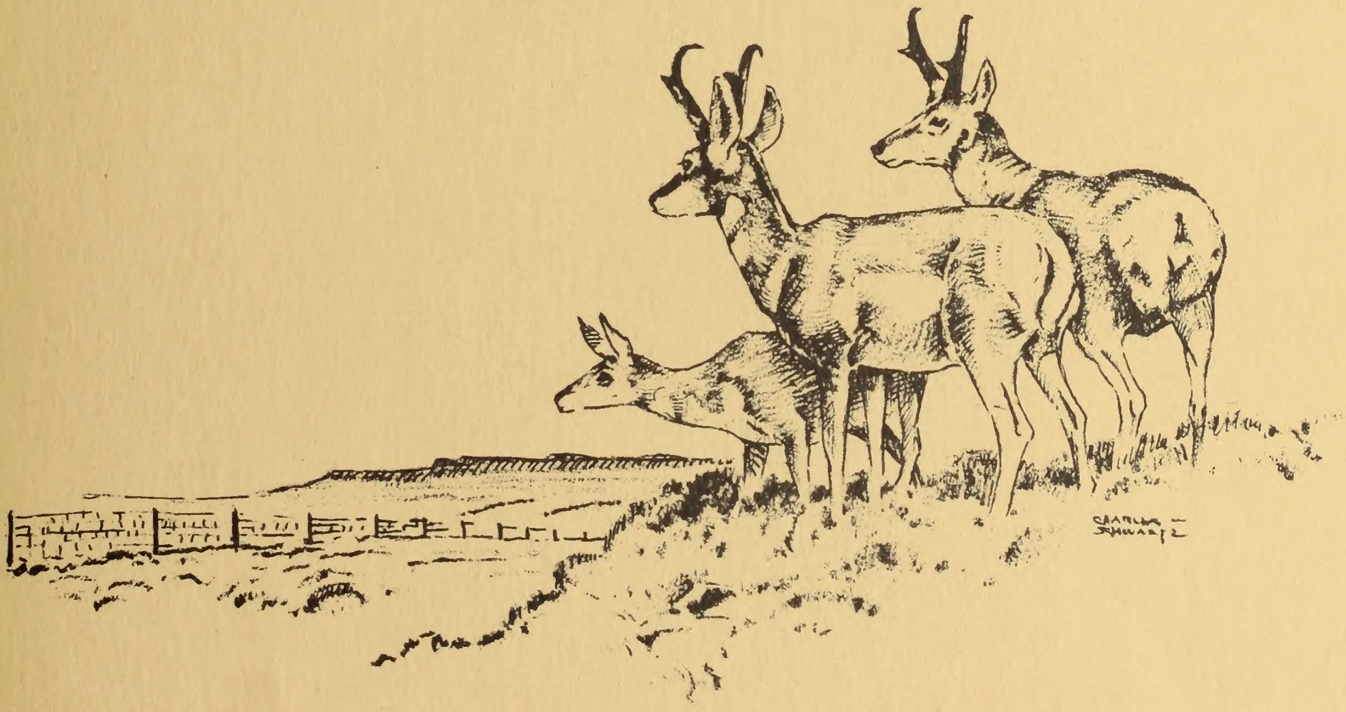

A Report to the Bureau of Land Management
United States Department of the Interior
by the
Wildlife Management Institute
June 1981

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United States Department of the Interior
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Wildlife Management Institute

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CONTENTS

Page

SUMMARY LIST OF RECOMMENDATIONS. ii

LIST OF ACRONYMS USED. v

INTRODUCTION 1

BLM WILDLIFE POLICY. 6

ENVIRONMENTAL IMPACT STATEMENT PROCESS 7

PLANNING PROCESS 9

RANGELAND MANAGEMENT PROGRAM DOCUMENT. 10

ALLOTMENT MANAGEMENT PLAN. 13

MONITORING 15

WILDLIFE INVENTORY 17

DECISIONS AND TRADE-OFFS 19

IMPROVING THE EIS FOR WILDLIFE 20

COORDINATION 21

STATE COOPERATION 23

ORGANIZATION, STAFFING AND PRIORITIES 26
    Washington Office 26
    State Organization 26

PERSONNEL. 29

FISH AND WILDLIFE PROJECTS 31

RESEARCH AND TECHNOLOGY TRANSFER 32

SUMMARY LIST OF RECOMMENDATIONS

Recommendations that appear throughout the report are outlined here for ease of reference. Please consult the text for discussion of each.

BLM WILDLIFE POLICY

1. BLM should draw together its many existing fish and wildlife policies, goals and objectives, fill in gaps as necessary, and publish them in a simple, concisely worded document for internal and external information, guidance and use.

ENVIRONMENTAL IMPACT STATEMENT PROCESS

1. Extreme care must be taken internally to ensure that BLM emphasizes all resource values in future EIS's and management decisions.

PLANNING PROCESS

1. BLM should strengthen the interdisciplinary team approach to planning.
2. BLM should manage wildlife habitat by land-use allocations to the greatest extent possible.
3. Contingency plans for catastrophes, such as drought, fire, insects and disease, should be prepared and be consistent with land-use plans.

RANGELAND MANAGEMENT PROGRAM DOCUMENT

1. BLM should establish a definite decision-making document that provides for adequate public input.
2. There is great need to assure consistency between the final EIS preferred alternative, the RMPD and the Allotment Management Plans (AMP's).

ALLOTMENT MANAGEMENT PLAN

1. AMP's should be prepared in compliance with wildlife objectives identified in the RMP/EIS.
2. BLM manual releases regarding coordination of activity plans--such as AMP's and Habitat Management Plans (HMP's)--are a matter of existing policy and should be followed without exception.
3. BLM should improve the quality and implementation of AMP's.
4. During and after the planning process in a given area, BLM needs to consider internal adjustments that encourage improved relationships with the livestock operator.

MONITORING

1. At every opportunity, BLM should emphasize the need for adequate monitoring to all those who have an effect on its programs.

2. BLM should develop a coordinated system to monitor vegetative changes for both livestock and wildlife.

WILDLIFE INVENTORY

1. BLM should take the steps necessary to ensure that standard inventory systems are understood and applied in the field.

2. BLM should undertake a cooperative effort with universities and other agencies to develop predictive models for the impacts of other resource uses on fish and wildlife.

3. BLM's access to Automatic Data Processing (ADP) for storage, analysis and retrieval of biological information should be expanded and improved, as should biologists' training in its use.

DECISIONS AND TRADE-OFFS

1. BLM should establish more explicit guidelines for decision makers having responsibilities for making resource trade-offs in the planning process.

COORDINATION

1. BLM should provide increased recognition for coordinating fish and wildlife with other resources to accomplish fish and wildlife goals.

2. BLM's wildlife program should take an active role in the experimental Stewardship Program.

3. BLM, in conjunction with the U.S. Forest Service, should assess the responsibilities and authorities of their respective management levels--Ranger Districts versus Resource Management Areas, for example.

4. BLM should develop and adhere to firm policies for servicing user complaints at the various levels of authority.

STATE COOPERATION

1. BLM should sponsor orientation sessions for state fish and wildlife agencies in basic range management, energy development, and applicable laws and regulations that guide BLM's activities.

2. BLM should assist the states financially in their participation in BLM's planning process, decision documents, monitoring and surveys.

3. BLM and state fish and wildlife agencies should seek to coordinate their respective management units and plans and, where appropriate, include those of other agencies.

ORGANIZATION, STAFFING AND PRIORITIES

1. The capabilities of the Washington Office (WO) Division of Wildlife and Endangered Species need to be strengthened.

2. The functions and deployment of biologists and associated positions (zoologists, botanists, etc.) should be defined at the State, District and Resource Management Area levels.

3. BLM should evaluate the advantages of managing the resources for which it is responsible under a regional office organizational structure.

PERSONNEL

1. By working internally and cooperating with other federal resource agencies and appropriate professional societies, BLM should participate in the effort to develop educational standards for wildlife and fisheries habitat biologists.

2. BLM should initiate immediate efforts to reduce the high turnover rate of personnel at all levels.

3. Intensive efforts should be made to give permanent status to the large number of When Actually Employed (WAE) employees needed to carry on BLM's program.

4. Efforts should be made to make BLM biologists comparable in grade to those of other agencies, such as the U.S. Forest Service and the U.S. Fish and Wildlife Service.

5. Employees must be held accountable for reaching wildlife goals and objectives.

6. An entry level training program for new biologists should be established and standardized on national and state levels.

7. Fisheries and wildlife biologists should have more opportunities for improving their skills with in-service training and for attending state, regional and national meetings.

FISH AND WILDLIFE PROJECTS

1. Projects should be used as a part of an overall land-use plan to reach stated goals for designated wildlife species or populations.

RESEARCH AND TECHNOLOGY TRANSFER

1. BLM should increase its research and technology transfer capabilities for fish and wildlife habitat management.

LIST OF ACRONYMS USED

ADP - Automatic Data Processing
AMP - Allotment Management Plan
AUM - Animal Unit Month
BLM - Bureau of Land Management
EIS - Environmental Impact Statement
HMP - Habitat Management Plan
IPA - Intergovernmental Personnel Act
MFP - Management Framework Plan
NEPA - National Environmental Policy Act
RMP - Resource Management Plan
RMPD - Rangeland Management Program Document
RPS - Rangeland Program Summary
SVIM - Soil Vegetative Inventory Method
WAE - When Actually Employed (temporary)
WMI - Wildlife Management Institute
WO - Washington Office

INTRODUCTION

In early 1980, the Bureau of Land Management (BLM) contacted the Wildlife Management Institute (WMI) with a request that WMI examine fish and wildlife programs on public lands administered by BLM. As stipulated by the Bureau, the evaluation would involve an analysis of wildlife program interactions with Rangeland Management, including the livestock grazing environmental impact statements (EIS's).

With respect to fish and wildlife, BLM's objectives include maintaining diverse habitats and species variety, protecting riparian habitat and big game forage, providing cover for wildlife in livestock grazing plans, and ensuring compliance with national policies. Inadequate treatment of these objectives can force alteration of EIS schedules, annual work plans and personnel assignments. It poses the potential of stimulating more appeals and litigation, thus delaying implementation. It also causes stress among participants and offices. To complete its mission, BLM's wildlife inventory, input to planning/EIS documents, management attitudes and understanding, communication, Washington Office (WO) guidance, and work time must be adequate.

For WMI's in-depth evaluation, BLM selected the eight locations where inventory processes and EIS field actions were being or had been completed.

BLM assures that the locations selected are representative. They are: Mountain Foothills, Montana; Sandy, Wyoming; Cowhead Massacre, California and Nevada; Drewsey, Oregon; Grand Junction, Colorado; East Roswell, New Mexico; Vermillion, Arizona; and Owyhee, Idaho.

The cooperative agreement for this cost-shared project was signed in June 1980. BLM paid travel, lodging and associated expenses. WMI paid its own staff salaries and related expenses. Field work was done between July 1980 and January 1981. This report is submitted to BLM in fulfillment of the terms of the agreement.

In addition to field visits to the eight selected locations by at least two members of the WMI team and review of pertinent documents and records, more than 300 individuals were interviewed or contacted during the course of the study. Interviews were conducted privately by WMI personnel on a "not for attribution" basis. Group discussions were held with those persons in the "contacted" category. All BLM personnel were cooperative and candid, and gave freely of their time to furnish information and opinions regarding BLM's fish and wildlife programs, including interrelationships with Rangeland Management, the general public, commodity users and agencies. Information was obtained from most resource disciplines at many levels. In addition to BLM personnel at EIS locations, WMI interviewed District Managers, Area Managers, biologists and range conservationists from other districts and areas who were available during visits to the study locations. Also among those interviewed were personnel from state fish and wildlife agencies in states in which the selected grazing EIS areas were located. In addition, interviews were conducted routinely with available personnel in the State Directors' offices. It would have been difficult to complete this task and submit the report without the cooperation and assistance of these many dedicated and interested people.

Interviews and visits conducted by the Wildlife Management Institute

State	BLM Personnel Interviewed*	BLM Personnel Contacted**	State Fish and Wildlife Agency Personnel Interviewed	Other Individuals Contacted***
Arizona	12	3	3	-
California	18	18	2	-
Colorado	19	4	10	-
Idaho	21	3	7	1
Montana	29	5	3	10
New Mexico	14	18	5	2
Nevada	-	-	3	-
Oregon	21	8	5	-
Wyoming	12	16	5	-
Washington, D.C.	-	30	-	-
TOTAL	146	105	43	13

* Structured, in-depth interviews
** General group discussion
*** Ranchers, U.S. Forest Service and U.S. Fish and Wildlife Service personnel

By organizational assignment, BLM personnel interviewed or contacted included the following:

State Offices	7	State Directors
	6	Associate State Directors
	5	Chiefs of Resource Divisions
	8	Chiefs of Biological Resource Branches
	4	Range Specialists
	10	Wildlife Biologists
	11	Planning and Environmental Coordination Staff
	4	Fish Biologists
	1	EIS Team Leader
	1	EIS Team Biologist
District Offices	8	District Managers
	4	Assistant District Managers
	5	Chiefs of Resources
	5	Environmental Coordinators
	15	Wildlife/Fisheries Biologists
	6	Range Conservationists
	8	Planning and Environmental Coordinators
	3	Natural Resource Specialists
	3	Hydrologists
	2	EIS Team Leaders
	1	Soils Scientist
	1	Chief of Operations

Area Offices	16	Area Managers
	10	Supervisory Range Conservationists
	18	Range Conservationists
	12	Biologists
	1	Soils Scientist
	2	Hydrologists
	1	Botanist
	1	Recreation Specialist
Washington Office		Director
		Deputy Director-Services
		Deputy Director-Lands and Resources
		Assistant Director-Renewable Resources
		Assistant Director-Recreation and Environmental Areas
		Chief, Division of Wildlife and Endangered Species
		Chief, Division of Rangeland Management
		Chief, Division of Wild Horses and Burros
		Budget Officer
		Chief, Office of Planning and Environmental Coordination
		Chief, Branch of Environmental Coordination
		Chief, Branch of Planning Coordination
		Chief, Office of Program Evaluation
		Division of Wildlife Staff

WMI did not attempt to evaluate specific management practices because it would not have been possible to do so within the time constraints of the agreement. However, considerable time was spent with BLM personnel examining on-the-ground activities in the eight EIS areas to discuss procedures used for planning and coordination, management problems, and anticipated and actual results. The study also did not involve judgement of the competence or efficiency of personnel.

The 337 million acres of BLM lands contain important fish and wildlife habitat. For that reason, WMI welcomed BLM's request and was pleased to undertake this cooperative project. WMI's experience in various studies and surveys makes clear that:

A. Public demands for fish- and wildlife-oriented outdoor recreation are increasing;

B. Competition will increase for uses of public lands, often to the detriment of fish and wildlife habitat;

C. Public lands will become increasingly important to hunters, anglers, wildlife viewers and other recreationists as gaining access to and providing and maintaining wildlife habitat on intensively used private lands become more difficult;

D. Because of their substantial acreage, diversity and geographical distribution, public lands--with comprehensive planning and balanced program implementation--can contribute significantly toward meeting public demands and expectations for a variety of services and products, including fish and wildlife;

E. Differences in human populations numbers among states and different BLM Districts within states greatly affect management needs and intensities of management on public lands.

Although WMI's field work focused on eight grazing EIS areas in nine states, the discussions and recommendations in this report are applicable throughout BLM grazing lands in the contiguous states. Not unexpectedly, the states studied have significant differences in organization, staffing, approach and attitude. Some of the recommendations in this report have been achieved in some locations or are being implemented to some degree. Many of the 251 BLM employees interviewed or contacted have worked in other locations. Discussions with them, therefore, coupled with the WMI's regular national and regional involvement with BLM activities, enabled WMI to identify problems and offer solutions on a broader basis than a prescription for any particular District or Resource Management Area.

WMI's recommendations are directed toward creating an organizational system to manage wildlife habitat and to undertake and encourage activities that recognize fish and wildlife for what they are--major resources and values

on public lands. It should be understood that ongoing activities may respond in some degree to some of the recommendations. To that extent, it is hoped that specific comment on them will emphasize their importance, hasten their full implementation and lead the way to other actions that should be set in motion.

BLM can make progress toward meeting demands and expectations for fish and wildlife by some adjustments in planning and financing, and by better internal coordination and increased cooperation with state fish and wildlife agencies. These opportunities are identified and discussed in this report.

BLM WILDLIFE POLICY

BLM's mission and responsibilities for fish and wildlife habitat are poorly perceived in the agency and even more so by the general public. Lands administered by the agency encompass habitat of great value to numerous and diverse species and thereby contribute to the nation's cultural, recreational, scientific and economic values. Recognition of these values is accorded in the Federal Land Policy and Management Act, wherein fish and wildlife are among the principal resources identified.

Although BLM has fish and wildlife habitat policies, goals and objectives, they are scattered throughout various manual sections and other directives. The public and many BLM personnel likely are unaware of them and their implications.

1. BLM should draw together its many existing fish and wildlife policies, goals and objectives, fill in gaps as necessary, and publish them in a simple, concisely worded document for internal and external information, guidance and use.

A summary publication of this kind would assist in the discharge of BLM's managerial responsibilities and preparation of grazing EIS's. It also would provide the public with a standard for evaluating agency programs.

ENVIRONMENTAL IMPACT STATEMENT PROCESS

Grazing EIS's prepared by the BLM are individually complex, but are even more complex and different depending on their date of preparation. In part, this is a result of the court order requiring preparation of grazing EIS's and changes in BLM guidelines for their preparation. Early statements were based on existing resource data and on hastily prepared Allotment Management Plans (AMP). Mid-period statements now being published, are based on Management Framework Plans (MFP), using existing resource data and public input. AMP's will be written after the MFP/EIS process is completed.

Current statements now are being prepared using new resource inventory information which is brought through a land-use planning process, either the MFP or the Resource Management Plan (RMP). Subsequent to the final EIS, and as a result of public review and input, BLM prepares a Rangeland Program Summary (RPS), formerly designated as the Rangeland Management Program Document (RMPD). The RPS outlines the proposed livestock grazing decisions by allotment. Finally, the District Manager issues a grazing decision to each livestock operator.

The public, along with the operator, may protest these decisions, as set forth in the new grazing regulations. At present, however, the actual workings of this policy have not been finalized. Some State Directors are looking to provide each of the hundreds of grazing decisions to the public, while other State Directors are looking to provide the public with a summary decision which can be protested.

A serious complication in preparation of the court-ordered EIS's is early deadlines that force use of existing and/or hastily gathered inventory data as the basis for long-range plans and management decisions. Overall, and not unexpectedly, given the orientation of the initial court order, the EIS's examined emphasized grazing over other resource values.

At first, BLM lacked EIS capabilities, procedures and experience. From 1969, when the National Environmental Policy Act (NEPA) was enacted, to the filing of the Natural Resources Defense Council, Inc., et al., suit on 30 December 1974, acceptable EIS methodologies had not been implemented as evidenced by the court's ruling. As a result of that ruling, BLM was compelled to undertake planning despite a lack of procedures and personnel. Total BLM funding and staffing increases (143 percent and 78 percent, respectively) between 1974 and 1979 have aided in carrying out the court's mandate, but not without problems. The expansion of staff at all levels resulted in promotions, transfers and continual shifting of personnel. The end result has been the delegation of EIS preparation responsibility to young and inexperienced BLM staff members.

Not only have the court-ordered grazing EIS's strained BLM's capabilities, the agency is attempting to comply with other mandated EIS's on timber, energy and mining, 27 legislative actions, and five Executive Orders since 1970. And while BLM employees are learning to work within the MFP process, a new RMP procedure is being tested with five pilot RMP/EIS's under the 1979 regulations.

Although WMI agrees that sound management plans should yield positive results in the long term, the effort is accompanied by short-term negative impacts. For example, the expanded funding base (143 percent) has not resulted in any commensurate increase in funding direct on-the-ground management--34 percent in 1976 and 46 percent in 1979. That the deadlines have been met is a tribute to BLM planning and the high quality of the agency's professional employees.

Data used for the early EIS's generally were inadequate; data now are better. For the most part, data on hunted species of wildlife have been furnished by state fish and wildlife agencies. Data on the nonhunted species have been gathered by BLM, either by seasonal employees or by contracting with

universities or state wildlife agencies.

1. Extreme care must be taken internally to ensure that BLM emphasizes all resource values in future EIS's and management decisions.

By the conclusion of WMI's field visits, the impression was gained that, in terms of funding and staff time, grazing is the activity that is driving the organization. NEPA compliance, in association with livestock grazing, intensifies the situation. The new RMP process was designed by BLM in response to such concern and may prove to provide an improved vehicle for addressing wildlife concerns.

PLANNING PROCESS

The BLM planning process, like the EIS process, is undergoing great change. The old method, with the mandated "tunnel vision" of Management Framework Plan (MFP) No. 1 with Nos. 2 and 3 following, now is being changed. The new system is only now being tested, and thus did not permit evaluation.

1. BLM should strengthen the interdisciplinary team approach to planning.

The MFP process suggests the use of interdisciplinary teams to negotiate multiple-use recommendations to be presented to the Area Manager. The problem is that most Area Managers decided not to use them, because of the work months required to make the process operable. Greater use of interdisciplinary teams would benefit BLM's wildlife mission.

Failure to follow the interdisciplinary team requirement most often results in the Area Manager and/or District Manager making unilateral decisions on conflicting resource views. Better multiple-use decisions can be reached if negotations and trade-offs are conducted by the resource specialists of a working interdisciplinary team prior to submission of recommendations to the Area and/or District Manager. The present decision-making procedure seldom recognizes the cumulative effects of the many small decisions made by line

officers, often without prior staff input.

The "tunnel vision" step in planning is a valuable exercise for each specialist in determining resource potential and should be retained. However, tunnel vision recommendations should be negotiated by an interdisciplinary team, the results of which are presented to the Area and/or District Manager.

The use of an interdisciplinary team, however, does not automatically ensure multiple-use decisions following publication of an RMP/EIS. It is WMI's understanding of the 1979 regulations that any decision is valid if it falls within the range of alternatives in the RMP/EIS.

2. BLM should manage wildlife habitat by land-use allocations to the greatest extent possible.

Current procedures permit allocation of Animal Unit Months (AUM's) to wildlife, recognizing location, season of use, quality and palatability of forage, and other pertinent factors. With the exception of some allocations of AUM's, little specific application of these procedures was observed. Subsequently, proper attention was not being given to key wildlife habitat, such as riparian zones, wintering and fawning grounds, etc.

3. Contingency plans for catastrophes--such as drought, fire, insects and disease--should be prepared and be consistent with land-use plans.

When catastrophes occur, hastily made plans contrary to long-range management goals may be implemented. Reclamation of wildlife areas often includes seeding livestock-palatable forage species or species having minimum utility to wildlife. Consequently, vegetative diversity important to wildlife is lost to extensive monoculture.

RANGELAND MANAGEMENT PROGRAM DOCUMENT

The RMPD follows the final EIS and briefly describes the final decision concerning management of lands covered by the EIS. Internally, the RMPD often is referred to as a decision document. BLM regards it as the most important

document in the agency's environmental planning process. However, it receives little attention from the public or other agencies, which incorrectly assume it merely summarizes the final EIS. In a number of cases, it was found that the RMPD differed substantially from the preferred alternative of the final EIS.

When a RMPD varies significantly in concept and detail from the preferred alternative of the final EIS, it conflicts with the general public's understanding of the NEPA process and raises serious questions about the value of public participation. In some EIS areas examined, WMI found major departures from preferred alternatives, departures that substantially increased negative impacts on fish, wildlife, and their habitats. Situations of this kind erode the confidence of BLM personnel, cooperative agencies and the public in the whole planning process.

1. BLM should establish a definite decision-making document that provides for adequate public input.

At the beginning of this evaluation, and based on past experience with EIS's developed by other federal agencies, WMI assumed that the RMPD would be consistent with the final grazing EIS. Frequent contact with state fish and wildlife agencies and private organizations and individuals confirmed that they also believed this to be the case. This belief was so widespread that most no longer were actively offering comments. They regarded the final EIS preferred alternative as the decision.

Unfortunately but unavoidably, due to BLM's shift from its MFP approach to the RMP/EIS approach, WMI's evaluation centered on a procedure that is being phased out. However, WMI's findings should prove useful in avoiding what are seen as definite weaknesses in the present process. WMI's interpretation of the regulations (Sec. 1601.5-8) indicates that this problem may not be corrected in the RMP/EIS procedures. This section appears still to allow

the decision maker to pick and choose any combination of alternatives.

WMI's finding that the final EIS's studied were not, in fact, decision documents was a concern expressed by a majority of BLM personnel interviewed. In some of the EIS areas visited, the planning process was not advanced far enough to track fish and wildlife recommendations through all the various planning steps to determine final trade-offs with other resource activities.

WMI was able, however, to track the trade-offs being considered on one EIS area where the MFP 3 was being prepared and by reviewing documents from two other EIS areas. On these three areas, the draft documents represented the final products of a continually weakening series of compromises made with the affected livestock operators. Wildlife will not receive adequate treatment if these decisions are implemented, and actually could be in a weaker position than before the beginning of the EIS process on some areas.

If not by intent then certainly by realities of on-the-ground management, BLM's actual decision document is the more site-specific AMP, a document that depends on negotiations between the livestock operator and BLM. Thus, in practice, BLM's final action relative to grazing EIS's is the cumulative total of AUM's and grazing systems on the individual allotments, which in no way may resemble the preferred alternative in the final EIS or the decision in the RMPD. However, the cumulative total of all AMP's and their impacts cannot help but fall within the range of the two commonly stated alternatives--maximum grazing and no grazing. Some variation of them will be used by BLM in the future even with the adoption of the RMP/EIS planning procedure.

2. There is great need to assure consistency between the final EIS preferred alternative, the RMPD and the AMP's.

ALLOTMENT MANAGEMENT PLAN

According to the regulations and policy, the RMPD* establishes the number of AUM's, season of use (if there is a possible conflict with other resources) and percentage of federal range. In practice, the most important of all BLM plans to wildlife is the AMP. The AMP, which is negotiated with the operator, may, and frequently does, vary considerably from what the public was led to believe was contained in the final EIS. The AMP can differ substantially from the intent of the RMPD.

1. AMP's should be prepared in compliance with wildlife objectives identified in the RMP/EIS.

Like the MFP 1, the AMP generally is written by BLM's least experienced employees, with the uncertain prospect of review by more experienced persons. AMP's normally emphasize livestock and basically are livestock management plans, not range management plans. Grazing permittees have great influence over the content of AMP's since their appeals, court tests or refusals to go along with an AMP can negate the planning process.

2. BLM manual releases regarding coordination of activity plans--such as AMP's and Habitat Management Plans (HMP's)--are a matter of existing policy and should be followed without exception.

For practical purposes, both AMP's and HMP's are written in a vacuum. This is somewhat analogous to the initial "tunnel vision" step in the MFP planning procedure. The decision maker can only view the implementation of an HMP as an impediment to negotiating with the permittee to accept an AMP. Also, in practical terms, the range conservationist must view HMP implementation and monitoring as being responsible for "someone else's program" and as a constant source of irritation in his dealings with livestock permittees. Given the appeal processes available, the permittee has considerable power to frustrate wildlife objectives, particularly if livestock reductions are sought.

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* RPS in the future

3. BLM should improve the quality and implementation of AMP's.

Because of the court-ordered EIS schedule, the formulation of specific AMP's has been hampered. To the extent they are being developed, AMP's are not receiving the attention they deserve. In one case, for example, WMI found that range conservationists were expected to prepare 12 AMP's each summer or about 1 per week. Although no lack of dedication to doing credible work was detected, it was a difficult task. For most AMP's, as previously noted, the writing was done by the least experienced range conservationists. Many had little direct knowledge of the unit of land with which they were dealing. Most had not even had an opportunity to become acquainted with the livestock operator. And since many range conservationists doing this work are when actually employed (temporary) employees (WAE's), it is unlikely that they will remain in place long enough to implement the AMP or determine its effectiveness.

4. During and after the planning process in a given area, BLM needs to consider internal adjustments that encourage improved relationships with the livestock operator.

Where possible and permitted by time, WMI took the opportunity to talk with livestock operators. By tradition, local custom and resource capability, grazing is and likely will continue to be a major use of public land. It is a use that impacts fish and wildlife. Rightly or wrongly, the livestock operator views past, present and future public land planning as a threat to his lifestyle.

What became clear through these discussions with livestock operators was their sincere feeling of lack of contact with BLM. Common complaints were:
(A) "The only time I see anyone from BLM is when they have a different plan";
(B) "Every few years they send out a new range conservationist"; and
(C) "Those people don't even know what running a ranch is all about." WMI is

not unmindful of the fact that all such comments cannot be taken at face value.

However, when evaluated in light of statements offered by BLM personnel such as (A) "We have operators that we have not seen in years," (B) "There is no way I can see all my permittees even once a year," or (C) "Most of our operator contacts have to be made by mail," they underscore problems that need attention. Much of the success or failure of implementing range improvement programs depends on mutual trust between BLM employees and the operators. The constant transfer of BLM personnel increases the difficulty of developing meaningful working relationships with livestock permittees.

MONITORING

The most important activity of the BLM planning system will be monitoring the results of the AMP's. Monitoring is stipulated as an integral part of the AMP's and the EIS process. BLM employees at all levels expressed doubt that monitoring will be done, based on experience over the past quarter century. It will require, at the least, continuing present levels of manpower; some of the commitments made in the AMP's and the EIS's will require increases. Monitoring undoubtedly will cost much more than present inventories have at present.

Monitoring must be site-specific. If two allotments are being operated differently--even with the same vegetative type and wildlife species present--then both must be monitored. Experience in Districts that have completed one EIS through the decision and AMP process and have started work on a second EIS show a marked tendency to use available personnel in the EIS process and to forgo or postpone monitoring.

Monitoring AMP's is a key to the BLM management process. BLM's personnel are keenly aware of this, and many expressed concern that the agency will not implement this necessary follow-up step.

1. At every opportunity, BLM should emphasize the need for adequate monitoring to all those who have an effect on its programs.

Monitoring of range resources and their planned use to ensure that programs are implemented as designed and produce desired results is most important. Monitoring activities should include BLM, state wildlife agencies and permittees. The latter must be involved and understand the process or they will question needed adjustments. BLM employees are conscious of monitoring needs and have planned for and described them in each EIS, but the financial and manpower resources required for such monitoring seldom are stipulated despite the requirements of 40 CFR 1505.3(b) and (d).

2. BLM should develop a coordinated system to monitor vegetative changes for both livestock and wildlife.

WMI found two problems in this regard. First, a number of exclosures were examined in EIS areas. There was little evidence that the vegetative information displayed in the exclosures was being used in any constructive manner to guide rangeland management. Second, range and wildlife specialists frequently conduct independent studies on allotments. Efficient use of personnel, funds and equipment would be improved by coordinated data collection for livestock management and wildlife.

Monitoring is an important term, but its meaning is viewed in different ways. BLM has not defined monitoring for range, let alone for other resources. Monitoring must discern the change of a natural ecosystem to see if the proposed objectives of multiple-use management are being met. The monitoring system must include evaluating changes in livestock, wildlife and fish habitat, range plants, invertebrates, water quality, weather, appearance, etc. Systems must be replicable and accurately reflect the change. BLM has not developed an overview, specific direction or procedures on the subject. Improperly or inadequately done, monitoring will not be the panacea that some suppose.

WILDLIFE INVENTORY

While discussing this evaluation with WMI, BLM officials expressed particular interest in the adequacy of wildlife input and inventory to the planning system. That best can be answered by some general observations.

WMI believes that, except in the very earliest EIS's, the level of wildlife data collected is adequate for the modest level of wildlife habitat management proposed. To use these data, however, wildlife specialists must predict anticipated results and not take refuge in innate professional conservatism. If, as hoped, the level of rangeland management is improved in time, then the quality of wildlife data must be upgraded apace.

Despite existing policy and procedures for coordinating vegetative and wildlife inventories, there is little evidence of compliance. Range conservationists could collect more wildlife data if provided with firmer direction, in-service training, adequate time and technical support. This also would provide a more cost-effective use of personnel. And it would familiarize range conservationists with wildlife resources and thereby improve their capability to deal with ranch operators relative to multiple-use plans.

BLM obtains fish and wildlife data from state agencies and, in some cases, under special contract. However, some states lack strategic plans and are unable to furnish the goals and objectives that BLM planners require to express wildlife's needs as fully as can be done for some livestock and other commodity uses.

Because of time constraints, some forage inventories as old as 15 years have been used in EIS preparation. These may have little relation to current conditions for fish and wildlife populations. BLM-wide, all resource disciplines, not only wildlife, would benefit from improved data storage and retrieval systems.

1. BLM should take the steps necessary to ensure that standard inventory systems are understood and applied in the field.

It became evident early in the study that BLM personnel are not using a uniform system, nor is there a uniform level of inventory. WMI is aware that the Soil Vegetative Inventory Method (SVIM) is the standard BLM system. But it is not being applied uniformly. The following were observed:

A. SVIM was not being used because inventory teams were unfamiliar with it;

B. SVIM had been tried, but the line officers did not use the data for making decisions;

C. SVIM was not used because of the press of time to meet court-ordered deadlines;

D. SVIM was said not to fit local conditions; and

E. SVIM inventory demands were not matched by adequate funding.

It is imperative that a uniform inventory system be applied and that it permit some latitude for approved modifications to meet local conditions. Given the variety of methods being used, a permanent inventory data base may not be established and present and future inventory data may not be comparable for assessing range condition trends.

2. BLM should undertake a cooperative effort with universities and other agencies to develop predictive models for the impacts of other resource uses on fish and wildlife.

BLM biologists should devote a major portion of their time coordinating and reacting to other proposed uses of resources--grazing, mining, etc. While it is essential that reliable inventory data be in hand, they are of little practical use unless they assist in predicting impact on and mitigation of fish and wildlife habitat. BLM decision makers face pressures from many interests and, when making trade-offs, often will lean toward the use with

the strongest, supportable evidence. Predictions relative to impacts on fish and wildlife are not persuasive when based on speculation.

To the credit of BLM wildlife personnel, some initial efforts are being made to develop predictive capability. BLM presently is expanding the U.S. Fish and Wildlife Service's "Procedures for Describing Fish and Wildlife," and is working with that agency in developing the Guilding concept.

3. BLM's access to Automatic Data Processing (ADP) for storage, analysis and retrieval of biological information should be expanded and improved, as should biologist's training in its use.

Field staff commonly appeared to be frustrated over the lack of ADP service. In too many cases, it seems that even improved service would not be fully used due to a lack of training in computer use. More than just in-service training would be required. Biologists should have the opportunity to attend short courses in computer use.

DECISIONS AND TRADE-OFFS

The stated goal in wildlife portions of the various decisions was a reasonable increase in wildlife forage. In many instances, if not in most, this did not and probably will not happen. These so-called "trade-off decisions" often are made unilaterally by Area and/or District Managers. Many trade-offs tend to be numerical rather than biological. WMI found numerous instances in which such decisions had not received prior input by staff specialists available at both District and Area levels. Where decisions routinely were reviewed by staff, the wildlife objectives and programs are superior to those where decisions and trade-offs were made unilaterally by line officers.

1. BLM should establish more explicit guidelines for decision makers having responsibilities for making resource trade-offs in the planning process.

It is important for resource decision makers to realize that a numerical compromise, in fact, may be undesirable from a fish and wildlife standpoint. For example, in the case of forage allocations, it may seem logical to reserve 20 percent of available forage for wildlife. In actual practice, however, that forage may be unavailable to wildlife at the time of greatest need. Such a situation would dictate that wildlife's 20-percent allocation be present in the form of 100 percent of the forage on critical seasonal ranges, such as wintering grounds, fawning or nesting areas, etc.

In one situation, WMI found that the wildlife recommendation was for a 3,000-foot buffer zone around raptor nests to ensure their survival. The compromise established a 1,500-foot buffer zone, which mathematically translates to a 50-percent attainment in wildlife goals. Biologically, if a 3,000-foot radius is required for a buffer zone, the outcome of a 50-percent reduction is a 100-percent loss of nests.

IMPROVING THE EIS FOR WILDLIFE

BLM specifically requested information on why some grazing EIS's gave fairer treatment to wildlife than did other EIS's. The answers are elementary and applicable agency wide. Four factors responsible for balanced treatment of wildlife in a grazing EIS are:

A. A journeyman biologist who has been in place at least four years. He knows the area, has credibility with other resource disciplines and a working knowledge of other resource uses (e.g. grazing systems), and has established working relationships with ranch operators. His data base and knowledge of the area enable him to represent fish and wildlife capably with other BLM specialists.

B. Good inventory data from which to develop sound recommendations to achieve established goals and objectives.

C. Line officer commitment to managing and improving fish and wildlife resources. This commitment should include each level--State, District and Area. WMI encountered no instance where all three levels had such commitment. Situations were observed where two of the three levels were sensitive to wildlife needs, and they produced the best grazing EIS's for wildlife of those evaluated.

D. Participation by the state fish and wildlife agency at all stages from preplanning to AMP's and monitoring. Coupled with this must be a state willingness to deal in wildlife population numbers.

COORDINATION

Coordination is the most important activity in accomplishing the multiple-use mission on the public lands. These lands are subject to myriad demands for goods and services. How well the planning and delivery system for one set of goods and services is integrated with that of other sets of goods and services determines BLM's ability to establish and sustain a balanced program. With respect to fish and wildlife, adequate coordination can be achieved only when a sufficient number of qualified, experienced biological personnel is in place at all levels. More attention needs to be given to providing wildlife support to range programs, engineering projects, minerals, etc.

1. BLM should provide increased recognition for coordinating fish and wildlife with other resources to accomplish fish and wildlife goals.

To encourage balanced plans and programs, a vital need exists to reflect accurately fish and wildlife coordination on achievement reports. Those responsible for fish and wildlife receive more credit for projects in acres or acre equivalents than they receive for the thousands of acres where they

may reduce harm to wildlife or enhance wildlife habitat by coordinating with other activities. In the coordination of projects, responsibility should rest primarily with the initiating program or discipline. At present, for example, many AMP's and environmental assessments are not being coordinated with other disciplines, including wildlife. Biologists should work with the initiating discipline in formulating these plans and not merely react to them, because at that point, decisions tend to be firm. Coordination, in this regard, should not be a response to a predetermined course of action.

It is BLM's responsibility to keep state fish and wildlife agencies informed on an orderly and timely basis. Coordination with others, such as the U.S. Forest Service and state lands agencies, could be improved at all levels. This will require more attention and more accountability on the part of BLM managers. Wildlife does not recognize ownership boundaries. The management plans of one agency or ownership can affect those of another agency or ownership and, hence, of wildlife in the area in general.

Coordination with commodity users is essential. No management plan is likely to succeed without their involvement.

2. BLM's wildlife program should take an active role in the experimental Stewardship Program.

Opportunities exist in this interesting new approach to benefit fish and wildlife and other resources as well. By encouraging involvement by public agencies and private interests, this approach recognizes that lands and waters exist as a cohesive system, not as unrelated tracts and fits well with the fact that wildlife adheres to no man-made boundaries.

3. BLM, in cooperation with the U.S. Forest Service, should assess the responsibilities and authorities of their respective management levels--Ranger Districts versus Resource Management Areas, for example.

During the course of WMI's field work, several opportunities occurred for discussions with U.S. Forest Service personnel. This proved fortunate for several obvious reasons--a rancher may graze livestock on national forests, BLM and private lands, and big game likewise may use all three ownerships. Regardless of the various season-of-use combinations, effective habitat management requires close coordination. For this to be the case, similar management authorities should be possessed by similar management levels in the agencies.

4. BLM should develop and adhere to firm policies for servicing user complaints at the various levels of authority.

WMI observed several instances where livestock operators and other users had bypassed the Area Manager and/or District Manager by taking to the State Office complaints that should have been resolved at a lower level. In such instances, the operators, finding satisfaction at the higher level, routinely bypassed the normal chain of command.

Unless there is an obvious breach of policy, actions previously cleared through review channels should be left to the assigned management level, with only program review from higher levels. In any case, contacts regarding BLM decisions, actions, etc., should be handled at the level of assigned responsibility.

STATE COOPERATION

Cooperation between state fish and wildlife agencies and the BLM has improved in recent years. Remaining is a basic difference that may have no solution, but should be recognized, even accepted, in order to keep communication channels open. By congressional mandate, BLM has a multiple-use charge to provide a range of goods and services. By comparison, state fish and wildlife agencies have a much narrower mission, with their major source of income received from hunting and fishing license sales. Neither BLM nor the state fish and wildlife agencies can be expected to stray far from their legally

defined missions. This, however, still permits considerable adjustment, thus the continuous need for coordination.

1. BLM should sponsor orientation sessions for state fish and wildlife agencies in basic range management, energy development, and applicable laws and regulations that guide BLM's activities.

Periodic orientation sessions can minimize misunderstanding that exists among personnel of both agencies over responsibilities, rules, policies and procedures. A primary goal of this effort would be to increase the amount and quality of state participation in BLM's management decisions and activities.

Discussions with state personnel revealed a lack of understanding of BLM's planning process, especially relative to decision making. For that reason, the states tended to concentrate on the EIS stage, believing that the proposed action constituted a final decision. As a result, little attention was directed to MFP 3's, RMPD's or AMP's. Unknowingly, the states dropped out too soon in the decision-making process.

This misunderstanding was evident in the excessive attention devoted to participating in the development and review of HMP's. Given limited personnel and funds, the amount of attention to HMP's by the states detracts from their capabilities to coordinate effectively on AMP's which impact far more acres. WMI found few instances where the states provided any significant input to AMP's.

2. BLM should assist the states financially in their participation in BLM's planning process, decision documents, monitoring and surveys.

Such assistance could be in the form of contracts or Intergovernmental Personnel Act (IPA) personnel exchanges. A number of arrangements were observed whereby BLM was providing funds, such as contracting with states for

wildlife population data. In one state, BLM was about to enter into an agreement to provide funds for a state position for an individual to coordinate state input to BLM activities.

All these funding agreements are of value and should be considered for use throughout BLM. However, they do not address the primary area where state participation is deficient, namely, the day-to-day involvement in on-the-ground activities. WMI found little state participation in such activities as range surveys, monitoring program implementation and results, and development of AMP's. These activities are not receiving the attention they deserve.

Adequate participation in one EIS effort requires 6-12 man-months on the state's part. When multiplied by several EIS efforts in other Resource Areas and National Forests, plus others by the U.S. Soil Conservation Service, Bureau of Reclamation, and U.S. Army Corps of Engineers, and the task exceeds the state's capabilities.

3. BLM and state fish and wildlife agencies should seek to coordinate their respective management units and plans and, where appropriate, include those of other agencies.

State fish and wildlife agencies have made substantial progress in developing comprehensive plans. Some are more advanced than others. While the observed degree of cooperation and coordination varied relative to the stage and detail of the state's planning, some observations are warranted: (A) a statewide plan may provide limited useful information--basically, existing populations and distribution--for the more detailed AMP's; and (B) operational plans with objectives and recommendations by management units are more useful for coordination with BLM plans.

One potential approach to resolve the problem would be through the cooperative development of statewide Sikes Act plans by the states and the federal land agencies. Such a process would feature a broad statewide plan

for overall coordination and establishing priorities. It would become site-specific as individual Sikes Act HMP's are developed.

ORGANIZATION, STAFFING AND PRIORITIES

The quality of wildlife consideration in plans and EIS's is a byproduct of management commitment and availability of experienced staff at the various levels producing such documents. From the standpoint of numbers, but not necessarily from the standpoint of placement or defined roles, BLM is fairly well staffed to discharge its fish and wildlife habitat management responsibilities.

Washington Office

1. The capabilities of the Washington Office (WO) Division of Wildlife and Endangered Species need to be strengthened.

The WO Division is not staffed adequately to respond to all of BLM's mission, and is particularly deficient in coordinating with range and forestry land policy and management initiatives and technical development. Additional capability is required. This can be handled by staff readjustments and assignment within BLM, rather than by hiring new personnel for this office.

State Organization

BLM's field organization consists of State, District and Resource Management Area offices. WMI found considerable variation in the organization, staffing and functions of these offices in regard to fish and wildlife.

2. The functions and deployment of biologists and associated positions (zoologists, botanists, etc.) should be defined at the State, District and Resource Management Area levels.

Priority tasks of the State Office biologists are policy development, program and budget development, evaluation, quality control, coordination, endangered species compliance, technical guidance, and training. Duties of lesser importance, but still time-demanding, include serving on task forces and as the Contracting Officer's Authorized Representative.

These functions should be performed as services to the District Offices. WMI does not believe that responsibility for development of the wildlife portion of the EIS's should rest in the State Office. The function of State Office biologists should be in review and quality control. Their role should be one of advocacy to assure that fish and wildlife receive fair and equitable treatment in the proposed actions and alternatives.

Priority tasks of the District Office biologists are program budget, land-use planning (including EIS input), project planning, planning review and coordination, training, and quality control. District Offices should provide planning and technical services to the Resource Management Area Offices.

Priority tasks for the Resource Management Area biologist are coordination (AMP's, environmental assessments, etc.), project planning and implementation, monitoring, and inventory. The requirements of the court-mandated EIS's result in the assignment of Area biologists to EIS teams, reducing the time and attention that can be given to other Area responsibilities. Care must be exercised to release these people as early and fully as possible so that they may focus their attention on the major tasks within the Area. Area biologists should be budgeted to spend 20-40 percent of their time on assignments other than wildlife. This will provide the experience to move from wildlife specialist to line officer, and also provide a better career ladder.

Furthermore, after the heavy schedule of court-mandated EIS's has been met, there will be an acute need for biologists at the Area level. This can be accomplished, in large degree, by reassignment of positions from State and District levels, because only 39 percent of BLM's biological staff Bureau-wide currently are in Resource Management Areas. It is at this level, of course, where the important on-the-ground work is done.

It is the general concensus that each Resource Management Area needs a biologist. At the present time, of the 136 grazing or nontimber Areas outside of Alaska and Oregon and California lands, 118 have at least one biologist. As coordination and monitoring become more routine and mechanical, there may be some opportunity to consolidate or replace biologists with wildlife technicians. This should be evaluated carefully at the proper time.

At present, the number of employees involved in EIS preparation and review in District and State Offices exceeds the number of planners, range conservationists, biologists and other discipline specialists actually involved in field operations. As an example of BLM temporarily being "top heavy" in planning and environmental coordination, one State Office had 18 people with such duties, a District had 8 and the Area had 0, although most resource staff members were involved in inventory and interdisciplinary teams plus individuals developing recommendations. Thus, the Area's planning/EIS effort was reviewed at two levels by 26 people. The situation is made worse because this amount of review goes into documents that, in reality, are not decision documents.

In contrast to the regional approach of other federal agencies, BLM has State Offices in each of the 10 western states.

3. BLM should evaluate the advantages of managing the resources for which it is responsible under a regional office organizational structure.

As a result of the current BLM organizational structure, there is much duplication of effort--for both professional and clerical staff--facilities and services. Besides its obvious economies, regionalization would release professional personnel for reassignment to ease staffing deficiencies at other levels. The extent of economy would depend on the number of regional offices established.

PERSONNEL

1. By working internally and cooperating with other federal resource agencies and appropriate professional societies, BLM should participate in the effort to develop educational standards for wildlife and fisheries habitat biologists.

WMI made essentially this same recommendation to the U.S. Forest Service in a similar report in 1979. The Forest Service has assigned the implementation of that recommendation to its WO with a target date of December 1981. BLM's WO, in cooperation with the Forest Service, should pursue this recommendation. Both agencies have similar needs.

2. BLM should initiate immediate efforts to reduce the high turnover rate of personnel at all levels.

Professional personnel are constantly coming and going. Most personnel interviewed believed that it took several years "to get their feet on the ground," and by that time, they would be moving to start the process anew. It was rare to find anyone who had been involved in an EIS from start to finish. Biologists, range conservationists and others were coming in at all stages of the process and were required, because of time schedules, to start dealing immediately with important resource planning. WMI found one case in which the entire Resource Management Area staff had changed in about four years. This is particularly disturbing considering the trend to place more management authority at the Resource Area level. For this delegation to produce most benefits, more intensive evaluations, inspections and accountability should be imposed.

3. Intensive efforts should be made to give permanent status to the large number of When Actually Employed (WAE) employees needed to carry on BLM's program.

The large number of WAE's is a contributing factor to rapid turnover of BLM employees. More than one-third of the wildlife program personnel are in this other-than-permanent category. When an opportunity arises for permanent status with another agency or at another BLM location, most WAE's will take it. In one state, 49 percent of all BLM employees are WAE's; in one Resource Area in the same state, 86 percent of all range conservationists are WAE's.

4. Efforts should be made to make BLM biologists comparable in grade to those of other agencies, such as the U.S. Forest Service and the U.S. Fish and Wildlife Service.

For the most part, BLM is about one grade level below comparable positions in other agencies. This increases turnover of BLM personnel--so much so, in fact, that BLM has the reputation of being a training ground for these other agencies.

5. Employees must be held accountable for reaching wildlife goals and objectives.

Line personnel frequently have rather narrow commitments to traditional uses. Once fish and wildlife goals and objectives are established, all personnel involved, not just biologists, should be held accountable for their accomplishments. In reality, one Area range conservationist, administering several AMP's, can have more influence on fish and wildlife habitat than does a biologist.

6. An entry level training program for new biologists should be established and standardized on national and state levels.

The new orientation course for beginning wildlife professionals in Phoenix is meritorious and will be of long-term benefit to the BLM. However, biologists may be on the job for several years before having an opportunity to attend the school. To compensate for this long period, an organized in-service, on-the-job, entry training program is essential. It is important

that new biologists acquire skills in vegetative analysis, grazing systems, fire management, minerals, rights-of-way and the many other tasks that are encountered in BLM coordination. Varying degrees of training were observed, but no consistent or uniform effort was evident.

7. Fisheries and wildlife biologists should have more opportunities for improving their skills with in-service training and for attending state, regional and national meetings.

Personnel have a continuing need to keep current with technical developments in fish and wildlife biology, habitat management and related sciences.

FISH AND WILDLIFE PROJECTS

The court-ordered EIS's have taken time and money, and have restricted BLM's ability to undertake range and wildlife projects. Although the court order has accelerated the hiring of biological personnel, these people largely have been involved in planning and EIS preparation, rather than in projects and coordination. They also are not involved in range-use supervision, trespass control and other intensive on-the-ground management actions.

This situation is a source of frustration to many BLM employees. WMI believes that the frustration is somewhat misdirected at this time, since more importantly, BLM's planning and EIS process is making land-use decisions. Coordinating and integrating wildlife habitat needs with commodity uses determine the future of fish and wildlife.

1. Projects should be used as a part of an overall land-use plan to reach stated goals for designated wildlife species or populations.

Projects should be targeted to provide specific habitat needs, not randomly scattered to accumulate acre equivalents. Regardless of the planning vehicle, projects should be designed to achieve stated goals.

RESEARCH AND TECHNOLOGY TRANSFER

BLM has no research arm. Dependence on outside research does not always meet BLM's informational needs.

1. BLM should increase its research and technology transfer capabilities for fish and wildlife habitat management.

BLM should establish an arm for research in rangeland, wildlife habitat and livestock/range problems, and for synthesis to supply information and data formerly provided by the Denver and Portland Service Centers. Little supporting technical or synthesis information now is available. The numerous management-oriented "research" projects conducted at the District or Area level are not true research. They frequently are poorly funded and often suffer from defects in design. They also may duplicate other work being conducted within BLM.

The Denver Service Center Division of Standards and Technology was terminated, with the technology thrust to be met by BLM task forces and contracting. This has proven to be an inferior and unsatisfactory approach. BLM administrators contacted during this evaluation frequently expressed concern over the loss of this service.

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